

City Manager  
(707) 822-5953

Environmental Services  
822-8184

Police  
822-2428



Community Development  
822-5955

Finance  
822-5951

Public Works  
822-5957

Transportation  
822-3775

April 15, 2013

David Estes  
Cypress Grove Chevre  
1330 Q Street  
Arcata, CA 95521

**RE: 2013 ANNUAL INSPECTION REPORT**

Dear Mr. Estes:

The City of Arcata Pretreatment Program requires that staff conduct at least one on-site inspection and sampling visit annually at Categorical Industrial User facilities. The purpose of an inspection is to determine compliance with the facility's Categorical Industrial Discharge Permit, to inspect the condition of the pretreatment equipment, and to collect effluent samples for laboratory analysis.

City of Arcata staff inspected the Cypress Grove Chevre (CGC) cheese production facility on April 10, 2013. The inspection was attended by Jeremiah Berger and yourself, Cypress Grove Chevre and Rachel Hernandez and Tracy Watkins, City of Arcata. The visit consisted of collection of effluent samples, a facility walk-through, review of facility records, inspection of the pretreatment system, and discussion of pretreatment concerns regarding the planned facility expansion.

Compliance Sampling

Upon arrival at the facility, pH was measured at the effluent sample location and was found to be 4.6 S.U. (sample time 12:56 p.m., sampler T. Watkins). CGC staff was informed that the facility was currently in violation of the effluent limitation for pH. CGC staff inferred that the low pH was due to using CIP equipment, which was currently running in preparation for a scheduled milk delivery later in the afternoon. On April 11, 2013 pH was re-sampled and found to be 4.7 S.U. (sample time 11:52 a.m., sampler R. Hernandez) at the effluent sample location. Mr. Estes was informed that the facility was currently in violation of the effluent limit for pH. CGC staff and Ms. Hernandez discussed that CGC would need to find a solution to pH violations. Mr. Estes indicated via email on April 11, 2013 that CGC had purchased a 24-hour pH data logger so that they could track pH fluctuations in the effluent and find a solution to pH violations.

A Notice of Violation for noncompliance with pH effluent limitations is enclosed. CGC is required to respond to the Notice of Violation with a plan for corrective action.

A composite sampler was set up to collect 1 sample every hour, for a twenty-four hour period. The sampler was started at 1:06 p.m. on April 10, 2013. Flow meter readings indicated that 5812 gallons of effluent was discharged during the 24-hour sampling period. A grab sample for oil & grease was collected at 11:55 a.m. on April 11, 2013.

Chain of custody and laboratory reports issued by North Coast Laboratories indicate that compliance samples are not being received below the sample preservation temperature of 6°C. The City of Arcata does not expect grab samples to be at or below the preservation temperature when delivered to the laboratory since it would take several hours to cool the samples and it is customary to deliver the samples to the laboratory shortly after



sampling. However, BOD and salinity composite samples should be below the preservation temperature since adequate ice should be used in the sampler during composite collection. The City recommends that CGC use crushed ice in the composite sampler rather than ice packs and that the ice is refreshed, if necessary, during the sampling period.

Laboratory results from the sampling event will be forwarded to Mr. Sonny Simonian when they are available.

#### Facility Walk-Through

During the facility inspection it was noted that CGC had completed the installation of an automated chemical pumping system in the milk delivery bay/chemical storage room. In addition, some 55-gallon drums are now stored in double barrel style secondary containment. Mr. Estes noted that he was in the process of finalizing an update to the Spill/Slug Discharge Plan for the facility. The Spill/Slug Discharge Plan and updated Material Safety Data sheets were subsequently submitted to the City of Arcata via email.

No other major changes to the facility were observed during the walk-through.

#### Pretreatment System

A review of records indicates that the cheese filter is being inspected and cleaned periodically. The pretreatment system/interceptors are cleaned every 6-months by Steve's Septic. The interceptors were found in good condition and all had one inch or less of suspended grease and minimal solids accumulation. It was estimated that it had been two months since the interceptors were last pumped.

#### Facility Pretreatment Upgrade

CGC is in the planning stages of a facility expansion including a new pretreatment system. Building plans will be submitted to the City shortly and CGC is hoping to break ground on project as soon as possible. When submitted, the building plans will have a footprint showing the location of the new pretreatment system, however, CGC is still in the process of researching and selecting a pretreatment solution to chronic oil & grease violations and for the reduction of BOD.

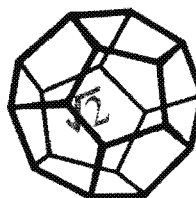
CGC has indicated that it prefers to install and operate a "natural" pretreatment system consisting of an attenuation tank and constructed marsh system. All parties involved are concerned that this system may not adequately address emulsified oil & grease in the waste stream, seasonal variations in treatment, and start-up time. CGC plans on conducting jar tests to address concerns about emulsified oil & grease treatment and plans on further researching the adequacy of a natural pretreatment system. During the annual inspection, Mr. Estes and Ms. Hernandez discussed some of the major concerns that the City has about the proposed pretreatment system. CGC will have a pretreatment system proposal ready in approximately 4 weeks.

If you have any questions or concerns regarding the findings of this report please contact me at (707) 825-2148.

Sincerely,

Rachel Hernandez  
Environmental Compliance Officer, City of Arcata

enclosure: Notice of Violation



**NORTH COAST  
LABORATORIES LTD.**

April 23, 2013

City of Arcata  
736 F Street  
Arcata, CA 955216211

Attn: Rachel Hernandez

RE: CGC 2013 Annual

Order No.: 1304216

Invoice No.: 108956

PO No.: 8910

ELAP No.1247-Expires July 2014

**SAMPLE IDENTIFICATION**

Fraction	Client Sample Description
01A	CGC 24HC
01B	CGC 24HC
02A	CGC grab


ND = Not Detected at the Reporting Limit

Limit = Reporting Limit


Flag = Explanation in Case Narrative

All solid results are expressed on a wet-weight basis unless otherwise noted.

**REPORT CERTIFIED BY**

  
\_\_\_\_\_  
Laboratory Supervisor(s)

  
\_\_\_\_\_  
QA Unit

  
\_\_\_\_\_  
Jesse G. Chaney, Jr.  
Laboratory Director

Date: 23-Apr-2013  
WorkOrder: 1304216

## ANALYTICAL REPORT

Client Sample ID: CGC 24HC  
Lab ID: 1304216-01A

Received: 4/11/2013  
Collected: 4/11/2013 12:06

Test Name: Biochemical Oxygen Demand

Reference: Std. Meth. 20th Ed. 5210 B

<u>Parameter</u>	<u>Result</u>	<u>Flag</u>	<u>Limit</u>	<u>Units</u>	<u>DF</u>	<u>Extracted</u>	<u>Analyzed</u>
Biochemical Oxygen Demand	2,100		2.0	mg/L	1.0		4/12/2013

Client Sample ID: CGC 24HC  
Lab ID: 1304216-01B

Received: 4/11/2013  
Collected: 4/11/2013 12:06

Test Name: Salinity

Reference: Std. Meth. 20th Ed. 2520 B

<u>Parameter</u>	<u>Result</u>	<u>Flag</u>	<u>Limit</u>	<u>Units</u>	<u>DF</u>	<u>Extracted</u>	<u>Analyzed</u>
Salinity	0.60		0.10	PPTH	1.0		4/19/2013

Client Sample ID: CGC grab  
Lab ID: 1304216-02A

Received: 4/11/2013  
Collected: 4/11/2013 11:55

Test Name: Hexane Extractable Grease and Oil

Reference: EPA 1664B

<u>Parameter</u>	<u>Result</u>	<u>Flag</u>	<u>Limit</u>	<u>Units</u>	<u>DF</u>	<u>Extracted</u>	<u>Analyzed</u>
Grease and Oil	120		5.0	mg/L	1.0	4/16/2013	4/18/2013

**CLIENT:** City of Arcata  
**Work Order:** 1304216  
**Project:** CGC 2013 Annual

**QC SUMMARY REPORT**

Method Blank

Sample ID: <b>MBLK</b>	Batch ID: <b>R74219</b>	Test Code: <b>1664GOW</b>	Units: <b>mg/L</b>	Analysis Date: <b>4/18/2013</b>	Prep Date: <b>4/16/2013</b>						
Client ID:		Run ID: <b>WC_130416B</b>		SeqNo: <b>1078226</b>							
Analyte	Result	Limit	SPK value	SPK Ref Val	% Rec	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Grease and Oil	ND	5.0									

**Qualifiers:** ND - Not Detected at the Reporting Limit  
J - Analyte detected below quantitation limits

S - Spike Recovery outside accepted recovery limits  
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

**CLIENT:** City of Arcata  
**Work Order:** 1304216  
**Project:** CGC 2013 Annual

**QC SUMMARY REPORT**  
Laboratory Control Spike

Sample ID: LCS	Batch ID: R74219	Test Code: 1664GOW	Units: mg/L	Analysis Date 4/18/2013				Prep Date: 4/16/2013			
Client ID:		Run ID: WC_130416B		SeqNo: 1078227							
Analyte	Result	Limit	SPK value	SPK Ref Val	% Rec	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Grease and Oil	37.50	5.0	40.0	0	93.7%	87	104	0			

Sample ID: LCSD	Batch ID: R74219	Test Code: 1664GOW	Units: mg/L	Analysis Date 4/18/2013				Prep Date: 4/16/2013			
Client ID:		Run ID: WC_130416B		SeqNo: 1078228							
Analyte	Result	Limit	SPK value	SPK Ref Val	% Rec	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Grease and Oil	38.40	5.0	40.0	0	96.0%	87	104	37.5	2.37%	18	

**Qualifiers:** ND - Not Detected at the Reporting Limit  
J - Analyte detected below quantitation limits

S - Spike Recovery outside accepted recovery limits  
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank

**CLIENT:** City of Arcata  
**Work Order:** 1304216  
**Project:** CGC 2013 Annual

**QC SUMMARY REPORT**

BOD Organic Standard

Sample ID: ORGSTD	Batch ID: R74202	Test Code: BODW	Units: mg/L	Analysis Date: 4/12/2013	Prep Date:						
Client ID:	Run ID: WC_130412E	SeqNo: 1077901									
Analyte	Result	Limit	SPK value	SPK Ref Val	% Rec	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Biochemical Oxygen Demand	200.0	2.0	198	0	101%	85	115	0			

**Qualifiers:** ND - Not Detected at the Reporting Limit  
J - Analyte detected below quantitation limits

S - Spike Recovery outside accepted recovery limits  
R - RPD outside accepted recovery limits

B - Analyte detected in the associated Method Blank



## Chain of Custody

Attention: R. Hernandez  
Results & Invoice to: City of Arcata  
Address: 736 E St  
Arcata, CA 95521  
Phone: (707) 825-2148  
Copies of Report to: prif to r hernandez +  
elust  
Sampler (Sign & Print): R. Hernandez Rachel Lee

Project Number: \_\_\_\_\_  
Project Name: CGC 2013 Annual  
Purchase Order Number: \_\_\_\_\_

[illegible][illegible]

TAT: ☒ STD (2-3 Wk) ☐ Other:  
PRIOR AUTHORIZATION IS REQUIRED FOR  
RUSH SAMPLES.

☐ State Forms  
☐ Geotracker ☐ SWAMP ☐ Other EDD:  
☐ Final Report PDF ☐ FAX By:

**CONTAINER CODES:** 1—½ gal. pl; 2—250 ml pl;  
3—500 ml pl; 4—1 L Nalgene; 5—250 ml BG;  
6—500 ml BG; 7—1 L BG; 8—40 ml VOA;  
9—60 ml VOA; 10—125 ml VOA; 11—4 oz glass jar;  
12—8 oz glass jar; 13—brass tube; 14—other  
**PRESERVATIVE CODES:** a—HNO<sub>3</sub>; b—HCl; c—H<sub>2</sub>SO<sub>4</sub>;  
d—Na<sub>2</sub>S<sub>2</sub>O<sub>5</sub>; e—NaOH; f—C<sub>2</sub>H<sub>5</sub>O<sub>2</sub>Cl; g—other

SPECIAL INSTRUCTIONS	SAMPLE CONDITION
12 drops HCl added to GGG	Temperature 4.3°C
Samples per NCL instruction	Received On Ice? (Y) N
immediately after sampling	Samples Intact? (Y) N
	Preserved? Y/N
	Preserved @ NCL?
	Y/N/NA

RELINQUISHED BY (Sign & Print)	DATE/TIME	RECEIVED BY (Sign)	DATE/TIME
Rachelle	4-11-13 1231	[Signature]	4/10/13 1231

☒ NCL Disposal of Non-Contaminated  
☒ Return ☐ Pickup

CHAIN OF CUSTODY SEALS Y/N/NA  
SHIPPED VIA: UPS Fed-Ex Hand

**ALL CONTAMINATED NON-AQUEOUS SAMPLES WILL BE RETURNED TO CLIENT**